

BEFORE THE
Federal Communications Commission
 WASHINGTON, D.C.

IN THE MATTER OF: DOCKET FILE COPY ORIGINAL MB DOCKET No. 05-130

Amendment of 47 C.F.R. §73.202(b)) RM-11216
Table of FM Allotments)
 (Thomas, Oklahoma))

To: Marlene H. Dortch, Secretary, FCC)
 ATTN: Chief, Audio Division)

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Federal Communications Commission
 Office of Secretary

COUNTERPROPOSAL

ROGER MILLS COUNTY BROADCASTING ("RMCB"), by its attorneys and pursuant to Notice of Proposed Rule Making, MB Docket No. 05-130, RM-11216, DA-05-754, released March 23, 2005 ("NPRM"), hereby submits its counterproposal in the above-referenced proceeding.¹ In support whereof, the following is respectfully submitted:

Original Proposal

1. In response to a Petition for Rule Making ("Petition") filed by Charles Crawford ("Crawford"), the Commission released the NPRM proposing the allotment of Channel 247A to Thomas, Oklahoma, as that community's first local aural service.

Counterproposal

2. In lieu of Crawford's Allotment Plan, RMCB proposed the allotment of Channel 247C3 to Cheyenne, Oklahoma as that community's first local aural service at coordinates 35-44-00 North Latitude, 98-42-00 West Longitude. Therefore, RMCB requests that the FM Table of Allotments be amended as follows:

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¹The NPRM established May 10, 2005 as the deadline for filing comments and counterproposals. Accordingly, the instant counterproposal is timely filed.

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
Cheyenne, OK	-----	247C3

This counterproposal will result in first local service, furthering the Commission's allotment priorities.²

***Allocation of Channel 247C3 Allotment
To Cheyenne is Superior to Allocation to Thomas***

3. The proposed allotment at Thomas, Oklahoma is the subject of a Notice of Proposed Rule Making first issued on March 23, 2005. While Crawford has requested Channel 247A for allotment to Thomas, the allotment of that Channel is mutually exclusive with RMCB's present request for 247C3 at Cheyenne. Furthermore, as will be demonstrated below, this counterproposal should be favored over the Thomas proposal.

Thomas, Oklahoma Already has a Channel Allotted to It

4. Although there is no current full service station in operation at Thomas, Oklahoma, there already is, in fact, a vacant FM channel there. The vacant allotment is for Channel 288A. This was added by Report and Order, DA 03-1119, April 11, 2003. Nowhere in Crawford's Petition does he mention the fact that this allotment exists. Cheyenne has no such vacant allotment and should therefore have priority over the Thomas proposal.

5. In addition to the pre-existing allotment, Thomas is a well-served community receiving twelve (12) primary broadcast services. Whereas this counterproposal for Cheyenne

² See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). (Here the Commission explained the FM allotment priorities which are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service and (4) other public interest matters.)

provides for the first local service to the community of Cheyenne, an underserved community with four (4) primary services.³

6. The Commission has long held that the spectrum use should be maximized. The channel in Cheyenne can be maximized to a Class C-3 which will cover over 21,000 people⁴ within the proposed 60 dbu area. Thomas with its Class A status will cover only 4,344 persons under its 60 dbu area.⁵

***Cheyenne is a Community Deserving
of First Local Service***

7. Cheyenne has been an incorporated town since 1908 with a current population of 778 persons.⁶ See Revision of FM Assignment and Procedures, 90 FCC 2d 88, 100 (1982) (requirement of an allotment to a community is generally satisfied if the community is either incorporated or listed in the U.S. Census).

8. As an incorporated town, Cheyenne is governed by an elected Town Board that is comprised of three Members and a Mayor. Day to day operations of the town are handled by the City Manager. In addition, Cheyenne has a fire department, water and trash service, a High School and Elementary School. Cheyenne also has its own post office and zip code of 73628.

³ See Technical Exhibit

⁴ *Id.*

⁵ *Id.*

⁶ See Cheyenne Oklahoma Chamber of Commerce Web Site (2005); 2000 U.S. Census.

10. Cheyenne is the county seat of Roger Mills County. In addition to County offices, Cheyenne is the home to the Roger Mills Memorial Hospital. Further there are two town parks in Cheyenne.

11. Cheyenne has a thriving business and civic community. Such businesses include Security State Bank, Dobson Telephone Company, Sunrise Feeds, B&H Café and Motel, Cheyenne Motel and Moler Construction. For a complete list of businesses, see Exhibit A. Churches in Cheyenne are First Baptist Church, United Methodist Church, Church of Christ and Pentecostal Church. Cheyenne also has a weekly newspaper in the community, the Cheyenne Star. However, Cheyenne does not have a local radio station.

12. Thus, RMCB proposes an allotment to provide a first local radio service to the well-established community of Cheyenne, Oklahoma. The proposed referenced site coordinates are 35-37-25 North Latitude and 99-40-11 West Longitude.

***Allocation of 247C3 Better Serves the Commission's
Allotment Priorities than an Allocation of 247A to Thomas***

13. While it is agreed by RMCB that Thomas is a community and generally deserves service, it does not deserve a second local service over that of Cheyenne's first local service. It is undeniable that a community deserving first service is given priority over second service. See Revision of FM Assignment Policies and Procedures, *supra*; Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989).

***The Public Interest is Best Served by an Allocation
of Channel 247C3 to Cheyenne, Oklahoma***

13. As the foregoing demonstrates, the allotment of Channel 247C3 is clearly in the public interest as it provides a first local service to Cheyenne and maximizes the use of Channel 247. The proposed site provides one hundred percent continual city-grade coverage to the community of Cheyenne, Oklahoma and is in compliance with all spacing requirements.⁷ there are no individuals that would be underserved as a result of the plan put forth in this counterproposal.

14. Therefore, RMCB requests that the FM Table of Allotments be amended as follows:

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
Cheyenne, OK	-----	247C3

15. RMCB hereby certifies that it has a present intention to apply for the new channel when adopted and when authorized will construct the facilities promptly on Channel 247C3 at Cheyenne, Oklahoma.

Conclusion

WHEREFORE, the above premises considered, the Petition filed by Charles Crawford should be DENIED, and the proposal of Roger Mills County Broadcasting should be ADOPTED in its entirety. Roger Mills County Broadcasting respectfully requests the Commission to adopt this counterproposal.

⁷ See Technical Exhibit.

Respectfully submitted,

Roger Mills County Broadcasting



By: _____

John C. Trent
Todd A. Steiner
Its Attorneys

Putbren Hunsaker & Trent, P.C.
200 S. Church Street
Woodstock VA 22664
(540) 459-7646

May 9, 2005

CERTIFICATE OF SERVICE

I, Sharon L. Hinderer, a Legal Assistant in the law firm of **Putbrese Hunsaker & Trent, P.C.**, hereby certify that I have on this 9th day of May, 2005, caused to be sent, by United States Mail, postage prepaid, copies of the foregoing, "**Counterproposal**" to the following:

Charles Crawford
4553 Bordeaux Ave.
Dallas TX 75205

Gene A. Bechtel, Esquire
Law Office of Gene Bechtel
1050 17th Street, N.W., Suite 600
Washington DC 20036

Sharon L. Hinderer
Sharon L. Hinderer

Exhibit A

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Cheyenne at a Glance**LOCATION:**

Cheyenne is located just 22 miles North of I-40 on State Highway 283.

POPULATION:

As County Seat of Roger Mills County 23.3% of the county population resides in Cheyenne at 778.

COMPANY	EMPLOYED	YEARS IN SERVICE
Cheyenne Public Schools	47	24 (new school)
Roger Mills Memorial Hospital & Buster Clinic	57	50
Town of Cheyenne	26	37
Dr. Steven Shrader, DDS	8	94
Roger Mills County	6	21
Cheyenne Care Center	93	95
Security State Bank	20	39
Dobson Telephone Co.	21	80
Market Square	19	42
Sunrise Feeds	11	3
Farmers Supply	35	50
State Highway Dept.	45	19
Senior Citizens Center	8	75
Rose Chapel Funeral Home	5	18
	3	35

Johnny Mc's Food & Fuel	6	22
Martin's Trading Post	4	26
Cheyenne Cleaners	1	50
Cheyenne Floral Company	7	2
Blackkettle Trading Post	2	6
Beavins' Tax Service	2	30
Mogg T.V.	1	46
Washita Battlefield	5	6
Santa Fe Salon	1	10
Cheyenne Insurance	4	15
Cheyenne Abstract	2	77
Cheyenne Professional Drug	6	20
Burns Arts & Crafts	1	8
B&H Cafe & Motel	15	15
Antiques & Things	1	1
Moler's 66	2	4
D&P Oil	2	17
The Village Within	4	4
Womanspirit Retreat	4	4
Rook Theater	4	82
Las Casuelas	6	5
#1 Okie	6	20
Cheyenne Animal Hospital	3	12
Smith Fertilizer	5	7
Cheyenne Motel	8	20
Barbara's Tax Service	1	20
Sandies Flower Garden...Too	1	14
Cheyenne Lumber	6	25
Odes' Drive In	2	16
Ivy Rose Cottage Bed & Breakfast	2	4
Framing Stall	2	1
Forest Service	9	48
Dovies' Shop	3	28
Roark Car Museum	1	4
USDA (current office)	5	10
O.S.U. Extension Office	3	88
Rockin' B Bucking Machine	7	5
Farm Bureau Insurance	2	56
Key Plumbing	3	15
Carl Suttle Electric	1	30
Trammell Service Co.	5	30
Carter Construction	3	15
Sadler's Service Center	2	26

Washita River Auto Bath	1	6
Cheyenne Housing Auth.	1	30
Cheyenne Ridge Apts.	1	24
Wesner's Auto Machine	3	21
Blackkettle Museum	3	44
Cheyenne Self Storage	2	5
Wes' Automotive & Welding	1	10
Moler Construction	7	7
Small Town Billboards	2	5
Briggs Family Museum (By Appointment Only)	1	1
Cheyenne Star	1	102
Specialty Cakes	1	4
Amsoil Distributor	1	3
Boyett's Tavern	5	27
Virginia's Beauty Shop	1	26
Joe's Barber Shop	1	38
US Post Office	7	n/a
Pioneer Museum	2	4
Tan & Talk Wireless	1	1
Peso Dollar Store	3	1
Glass Shop	1	1
Hamm & Phillips	1	8

UTILITY SERVICES:**CITY OFFICE**

Water & Trash

Electric - Public Service Company of Oklahoma

Natural Gas - Reliant Energy/Arkla

Telephone - Dobson Telephone Company

Internet Services - Intelleg

MEDICAL FACILITIES:

Cheyenne is home to 1 hospital with 15 beds. There is 1 clinic in Cheyenne, and 1 nursing home with 36 beds. Practicing full time in Cheyenne area is 2 medical doctors, 1 physicians assistant, and 1 dentist.

FINANCIAL INSTITUTIONS:

Cheyenne has 1 bank with assets totaling more than 76 million dollars.

PARKS:

10 ½ Acre Park located 1/8 mile South from State Highway 283 & 47 Junctions. Cheyenne has in this park, a public swimming pool, volleyball court, baseball field, softball field, museums, walking trails,

playground equipment, pavilion, picnic area and park benches, as well as an information center about the history of Roger Mills County. All these features are free of charge, with the exception of the public swimming pool.

3 Acre Park located West of Roger Mills Memorial Hospital. In this park is a picnic area, tennis courts, playground equipment, as well as park benches. These features are also free of charge.

TOWN BOARD:

Mayor: Glenna Kirk

Chairman: Larry Bradshaw

Member: A.R. Garling

City Manager: Richard Adams

EDUCATION:

Cheyenne Public Schools built the new facility in 1978, and has an enrollment of 266 students. School facilities include a 740 seat auditorium, 150 seat cafeteria, and a 1,000 seat indoor gymnasium, built in 1995.

CHEYENNE HIGH SCHOOL "Perpetuating Excellence"

STATE TOURNAMENT APPEARANCES

Girls Basketball - 1958, 86, 87, 91, 98, 99, 2002
Boys Basketball - 1968, 83, 2001
Girls SP Softball - 1996, 97, 98, 99
Girls FP Softball - 1999
Boys Baseball 1985, 88
One Act Play - 1993, 94, 95, 96, 97, 98, 2000
Academic Team - 1998, 99
CHS Band - 1996, 97, 99, 2002
Speech - 12 years

ALL STATERS

Girls Basketball - 15
Girls SP Softball - 4
Girls FP Softball - 3
Speech - 20
Academic Team - 2
OMEA Chorus - 3

STATE CHAMPIONS

Girls Basketball - 1985, 86, 87
Girls SP Softball - 1999
One Act Play - 1998, 2000
Speech - 1991, 99 (3), 2001 (3)

STATE RUNNER UP

Girls Basketball - 1999
Girls SP Softball - 1997
Boys Basketball - 1968
Academic Team - 1999
One Act Play - 1995, 97

ACADEMICS

State champions Softball - 1998
National Merit Scholar OK Foundation for Excellence - 3
Academic All-Staters: Girls Basketball - 4
Boys Basketball - 1

CONGRATULATIONS BEARS!!!

The Bear Legacy Continues...

CHURCHES:

First Baptist Church Pastor Jeff Hurlbut

United Methodist Church Pastor Fernando Padilla

Church of Christ Preacher Kendall Abner

Pentecostal Church Pastor Juanice Parkhurst

[Click here to go to www.rogermills.org website](http://www.rogermills.org)

Technical Exhibit

Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

This Technical Exhibit supports the Counterproposal to RM-11216, MM Docket No. 05-130 allocating Channel 247A to Thomas, Oklahoma. Instead, we propose to allocate Channel 247C3 to Cheyenne, Oklahoma and delete the proposed Channel 247A at Thomas, Oklahoma. The city of Thomas, Oklahoma already has an allocation on Channel 288A (RM-10538, MM Docket No. 02-249).

This proposal will provide the first local service to the city of Cheyenne, Oklahoma. Cheyenne is the county seat of Roger Mills County, Oklahoma. According to the 2000 U.S. Census the city of Cheyenne, Oklahoma has a population of 778 persons. Additional information on Cheyenne can be found elsewhere in this proposal. Cheyenne meets the Commission's requirements as a community, therefore it is eligible for an FM assignment.

It is proposed to utilize an allocation point of North Latitude 35° 37' 25" and West Longitude 99° 40' 11". From this allocation site, the entire city of Cheyenne will receive a 70 dBu city grade signal (see Exhibit #1). This proposal meets all of the spacing requirements of §73.207 of the Commission's rules (see Exhibit #2). From this allocation site, the 60 dBu contour of this proposed Class C3 facility will provide service to 21,004 persons (2000 U.S. Census) and will cover 4,657 square kilometers, whereas the 60 dBu contour of the proposal on Channel 247A at Thomas, Oklahoma would

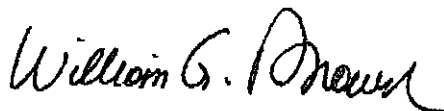
provide service to only 4,344 persons (2000 U.S. Census) and cover 2,516 square kilometers.

Additionally, the city of Cheyenne, Oklahoma only receives primary service from 4 stations (see Exhibits #3A-3B), whereas the city of Thomas, Oklahoma receives primary service from 12 stations (see Exhibits #3C-3D).

Proposed Changes to FM Table of Allotments

	<u>Present</u>	<u>Proposed</u>
Cheyenne, Oklahoma	None	247C3
Thomas, Oklahoma	288A (Allocation) 247A (Rule Making)	288A

All statements contained herein are thought to be accurate and true to the knowledge of the undersigned.



William G. Brown
Technical Consultant

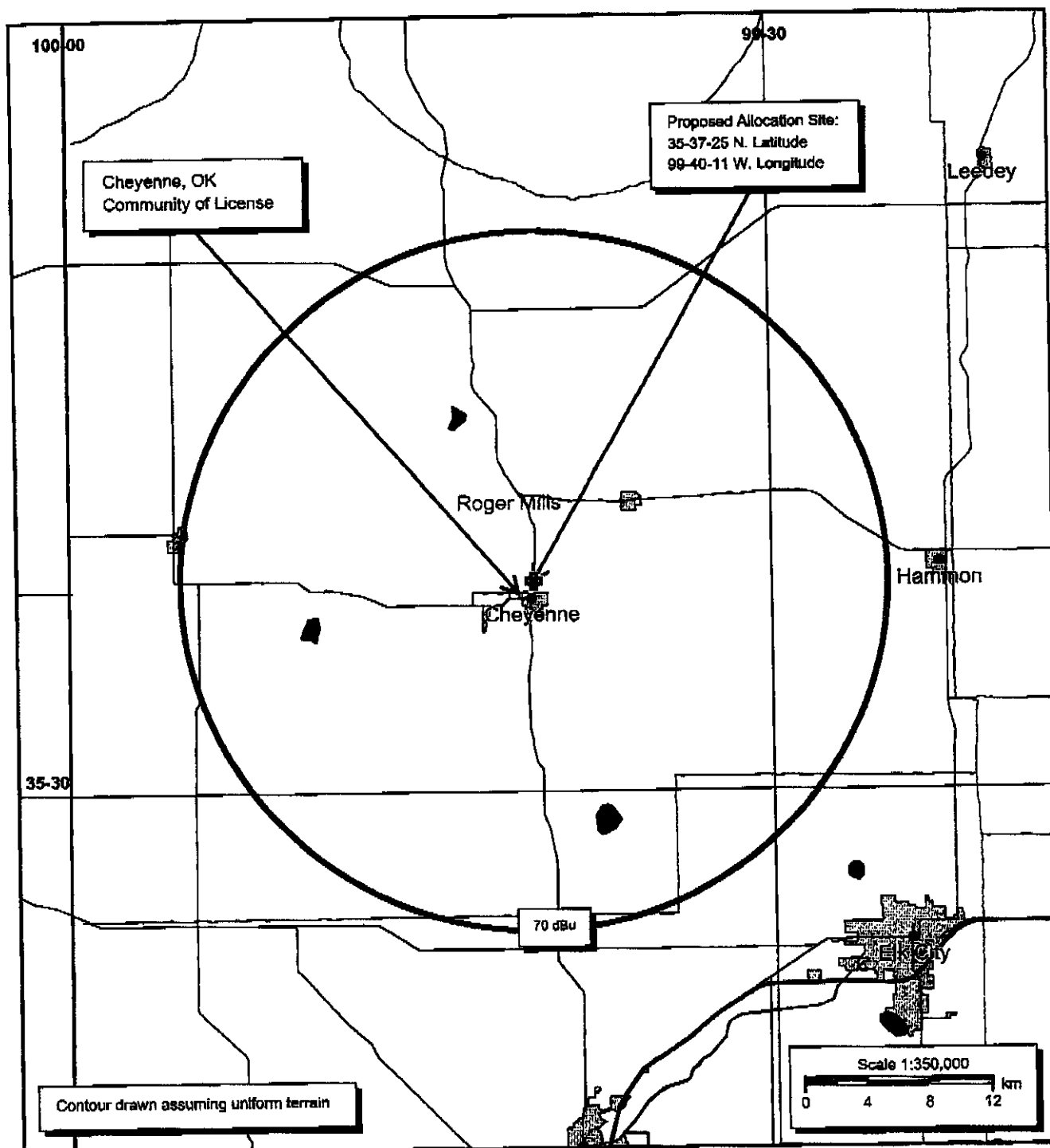


Exhibit #1
City Grade Contour
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

Exhibit #2
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

§73.207 Allocation Study

Searching from Proposed Allocation Site
 Cheyenne, Oklahoma

REFERENCE	CLASS = C3	DISPLAY DATES
35 37 25 N	Current	DATA 04-29-05
99 40 11 W	Spacings	SEARCH 04-29-05
----- Channel 247 - 97.3 MHz -----		

Call	Channel	Location	Asi	Dist	FCC	Margin
KWEYFM	LIC 247C1	Weatherford	OK 107.7	64.82	211.0	-146.18
* R---	247A	Thomas	OK 81.8	88.62	142.0	-53.38
AL248	VAC 248A	Wellington	TX 218.3	95.49	89.0	6.49
AL249	VAC 249A	Vici	OK 29.7	67.34	42.0	25.34
RADD	ADD 248C3	Perryton	TX 309.9	129.57	99.0	30.57
KKJQ	LIC 247C1	Garden City	KS 343.9	249.49	211.0	38.49
AL247	RSV 247A	Blanchard	OK 106.5	189.89	142.0	47.89
KHIM	LIC 249A	Mangum	OK 171.0	89.96	42.0	47.96
KWEYFM	APP-N 247A	Blanchard	OK 104.2	194.18	142.0	52.18
KSTQFM	APP 247C1	Plainview	TX 223.6	267.71	211.0	56.71
KSTQFM	APP 247C1	Plainview	TX 223.6	267.71	211.0	56.71
KSTQFM	LIC-D 247C1	Plainview	TX 223.6	267.71	211.0	56.71
KPAK	LIC 248C2	Alva	OK 29.1	178.60	117.0	61.60
RADD	ADD 248A	Chillicothe	TX 174.0	162.52	89.0	73.52
KEYB	LIC 300C2	Altus	OK 172.8	95.35	17.0	78.35
AL300	VAC 300C2	Mooreland	OK 22.2	101.18	17.0	84.18
AL245	VAC 245A	Eldorado	OK 179.1	127.62	42.0	85.62
AP245	APP 245A	Eldorado	OK 179.1	127.62	42.0	85.62
RDEL	DEL 245C	Enid	OK 76.9	182.83	96.0	86.83
KQOB	LIC-N 245C	Enid	OK 76.9	182.83	96.0	86.83
KQOB.C	CP -N 245C	Enid	OK 76.9	182.83	96.0	86.83
AP245	APP 245A	El Dorado	OK 174.6	130.77	42.0	88.77
AL248	RSV 248C1	Archer City	TX 161.4	234.70	144.0	90.70
RDEL	DEL 248C1	Archer City	TX 161.4	234.70	144.0	90.70
RADD	ADD 245C0	Enid	OK 76.9	182.83	87.0	95.83
DKRZB	CP 248C2	Archer City	TX 154.2	216.76	117.0	99.76
RDEL	DEL 248C2	Archer City	TX 154.2	216.76	117.0	99.76

* It is proposed to delete Channel 247A at Thomas, OK and allocate Channel 247C3 to Cheyenne, OK.

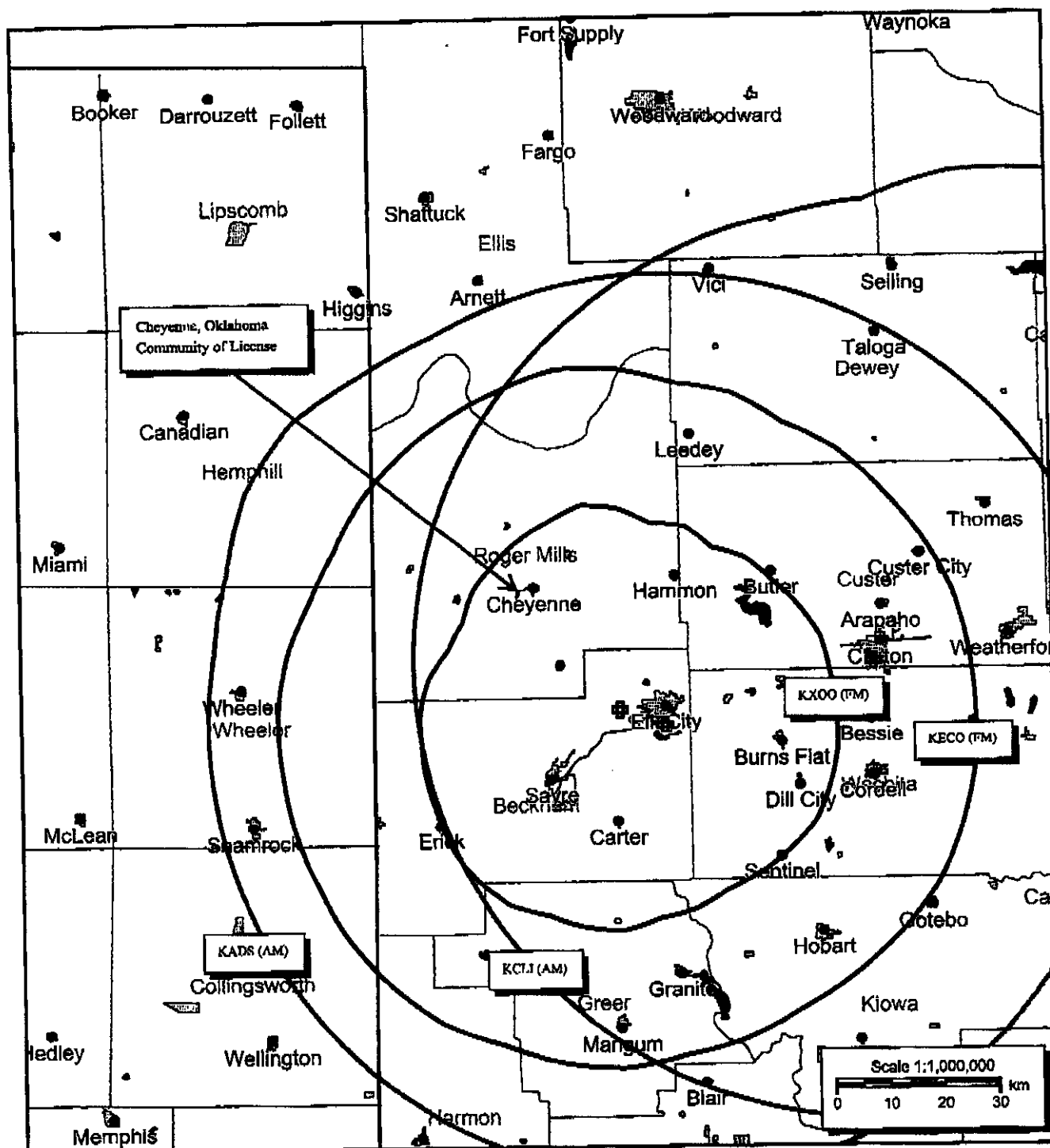


Exhibit #3A
Primary Services to the City of Cheyenne, Oklahoma
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

**Exhibit #3B
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005**

Tabulation of Primary Services to the City of Cheyenne, Oklahoma

AM Primary Services

<u>Call Sign</u>	<u>Frequency</u>	<u>City</u>
KADS	1240	Elk City, OK
KCLI	1320	Clinton, OK

FM Primary Services

<u>Call Sign</u>	<u>Frequency</u>	<u>City</u>
KECO	243C1	Elk City, OK
KXOO	232C3	Elk City, OK

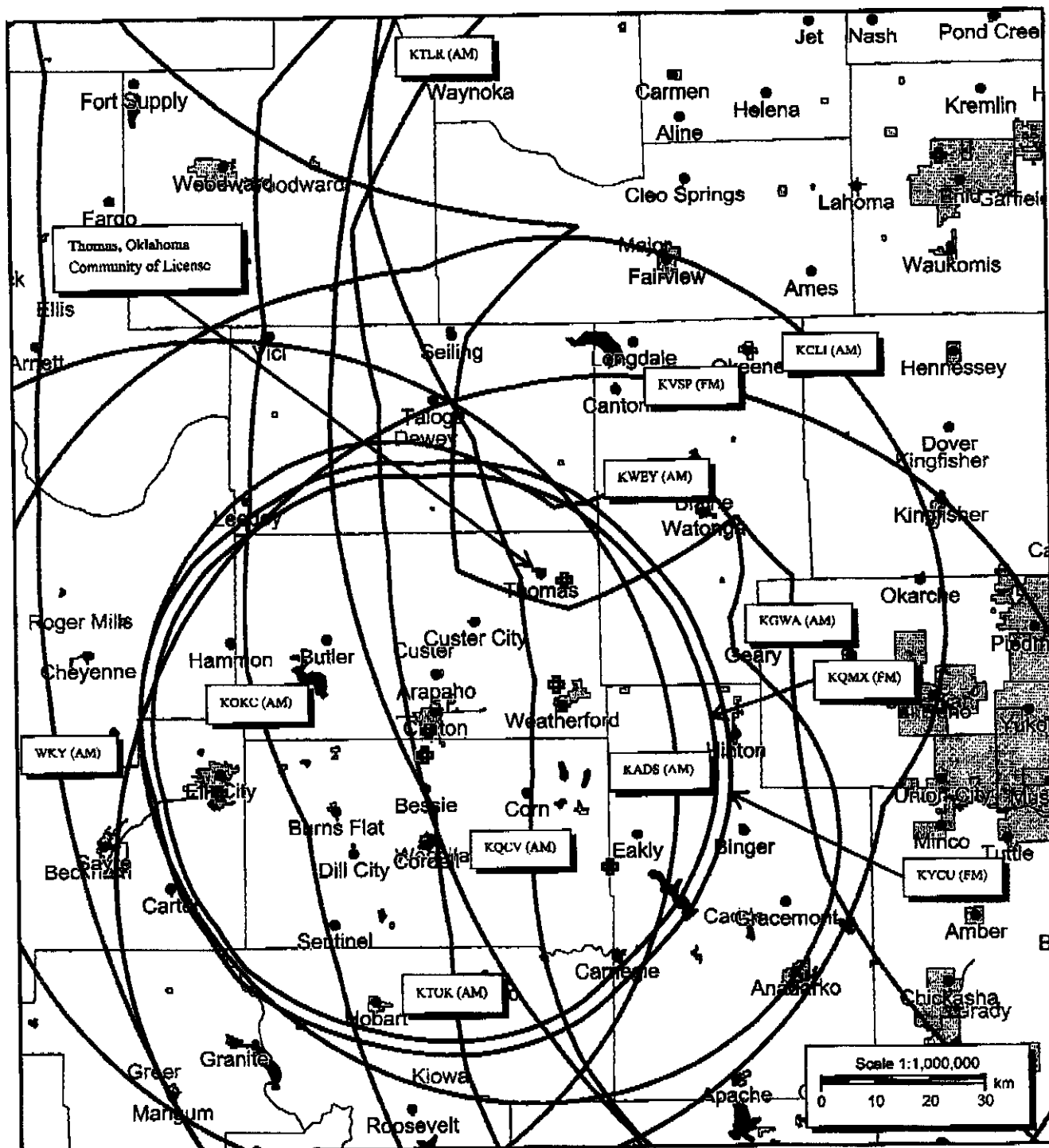


Exhibit #3C
Primary Services to the City of Thomas, Oklahoma
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

Exhibit #3D
Counterproposal
RM-11216
MM Docket No. 05-130
Allocate Channel 247C3 to Cheyenne, Oklahoma
Delete Proposed Channel 247A at Thomas, Oklahoma
May 2005

Tabulation of Primary Services to the City of Thomas, Oklahoma

AM Primary Services

<u>Call Sign</u>	<u>Frequency</u>	<u>City</u>
KADS	1240	Elk City, OK
KCLI	1320	Clinton, OK
KGWA	960	Enid, OK
KOKC	1520	Oklahoma City, OK
KQCV	800	Oklahoma City, OK
KTLR	890	Oklahoma City, OK
KTOK	1000	Oklahoma City, OK
KWEY	1590	Weatherford, OK
WKY	930	Oklahoma City, OK

FM Primary Services

<u>Call Sign</u>	<u>Frequency</u>	<u>City</u>
KOMX	238C2	Clinton, OK
KVSP	278C	Anadarko, OK
KYCU	206C1	Clinton, OK